

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: \_\_\_\_\_ ) Chapter 11  
W. R. GRACE & CO., et al.,<sup>1</sup> )  
Reorganized Debtors. ) Case No. 01-01139 (KJC)  
 ) (Jointly Administered)  
 ) Hearing Date: July 21, 2016, at 2:30 p.m.  
 ) Objection Deadline: July 12, 2016, at 4:00 p.m.  
 )

**NOTICE OF REORGANIZED DEBTORS' FOURTH MOTION FOR AN ORDER  
EXTENDING THE CHAPTER 11 PLAN DEADLINE BY WHICH THE  
REORGANIZED DEBTORS MAY OBJECT TO CLAIMS**

TO: (i) The Reorganized Debtors; (ii) The Office of the United States Trustee; (iii) Counsel for the WRG Asbestos PI Trust; (iv) Counsel for the Asbestos PI Future Claimants Representative; (v) Counsel for the Asbestos PD Future Claimants Representative; (vi) Counsel for the WRG Asbestos PD Trust (7A); (vii) Counsel for the WRG Asbestos PD Trust (7B); (viii) Counsel for the CDN ZAI PD Claims Fund; (ix) those parties the requested service and notice of papers in accordance with Fed. R. Bankr. P. 2002; and (x) as required by Plan Art. 5.1.1, "all holders of Plan Claims (other than Asbestos PI Claims, Asbestos PD Claims, and CDN ZAI PD Claims) that are still pending allowance and are not subject to a pending objection.

On June 24, 2016, the above-captioned reorganized debtors (collectively, the "Reorganized Debtors") filed the attached *Reorganized Debtors' Fourth Motion for an Order Extending the Chapter 11 Plan Deadline by Which the Reorganized Debtors May Object to Claims* (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court"). A true and correct copy of the Motion is attached hereto.

Responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern time) on **July 12, 2016**. At the same time, you must also serve a copy of the objections or responses, if any, upon the

<sup>1</sup> The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or "Grace") and W. R. Grace & Co.-Conn. ("Grace-Conn.").

following: (i) co-counsel for the Reorganized Debtors, Adam C. Paul, Esq. and John Donley, Esq., Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, IL 60654 and Roger J. Higgins, Esq., The Law Offices of Roger Higgins, LLC, 1 North Bishop Street, Suite 14, Chicago, IL 60607-1823 and Laura Davis Jones, Esq. and James E. O'Neill, Esq., Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17<sup>th</sup> Floor, PO Box 8705, Wilmington, DE 19899-8705 (Courier 19801); (ii) the Office of the United States Trustee, T. Patrick Tinker, U.S. Department of Justice, Office of the U.S. Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801; (iii) counsel for the WRG Asbestos PI Trust; Marla Rosoff Eskin, Esq. and Mark T. Hurford, Esq., Campbell & Levine, LLC, 222 Delaware Avenue, Suite 1620, Wilmington, DE 19801 and Philip E. Milch, Esq., Campbell & Levine, LLC, 310 Grant Street, Suite 1700, Pittsburgh, PA 15219; (iv) counsel for the Asbestos PI Future Claimants Representative, John C. Phillips, Jr., Esq., Phillips, Goldman, McLaughlin & Hall, P.A., 1200 North Broom Street, Wilmington, DE 19806; (v) counsel for the Asbestos PD Future Claimants Representative, R. Karl Hill, Esq., Seitz, Van Ogtrop & Green, P.A., 222 Delaware Avenue, Suite 1500, P.O. Box 68, Wilmington, DE 19899 and Alan B. Rich, Esq., Attorney and Counselor, 4244 Renaissance Tower, 1201 Elm Street, Dallas, TX 75270; (vi) counsel for the WRG Asbestos PD Trust (7A), Richard B. Schiro, WRG Asbestos PD Trust, c/o Wilmington Trust, Attn: Corporate Trust Administration, 1100 N. Market Street, Wilmington, DE 19890-1625 and Deborah D. Williamson, Esq., Dykema Cox Smith, 112 E. Pecan Street, Suite 1800, San Antonio, TX 78205; (vii) counsel for the WRG Asbestos PD Trust (7B), Edward B. Cottingham, Jr., Esq., The Cottingham Law Firm, 317 Wingo Way, Suite 303, P.O. Box 810, Mt. Pleasant, SC 29465 and M. Dawes Cooke, Esq., Barnwell Whaley Patterson & Helms LLC, P.O. Drawer H, Charleston, SC 29402; and (viii) counsel for the CDN ZAI PD Claims Fund, Daniel K. Hogan, Esq., The

Hogan Firm, 1311 Delaware Avenue, Wilmington DE 19806 and Yves Lauzon, Esq., Michel Belanger, Esq., Lauzon Belanger Lesperance Inc., 286, Rue St-Paul Ouest, Bureau 100, Montreal, Quebec, H26 2A3 CANADA.

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD BEFORE THE HONORABLE KEVIN J. CAREY AT THE UNITED STATES BANKRUTPCY COURT, 824 MARKET STREET, WILMINGTON, DELAWARE 19801, ON **JULY 21, 2016 AT 2:30 P.M. PREVAILING EASTERN TIME.**

Dated: June 24, 2016

KIRKLAND & ELLIS LLP  
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John Donely  
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and

THE LAW OFFICES OF ROGER HIGGINS, LLC  
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and

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ James E. O'Neill*

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